

### REMARKS

Claims 1 and 2 have been amended. Written description support for these amendments is found throughout the original specification, for example, at page 5, lines 2-11; at page 8, lines 1-10; at page 9, 1-31; at page 10, lines 1-21; and at FIGS. 1 and 5. Claims 5 and 6 have also been amended. Written description support for these amendments is found throughout the original specification, for example, at page 2, lines 13-29; at page 6, line 23 to page 7, line 4; and at page 11, lines 9-27. Applicants have also amended claim 10 to correct a typographical error (no substantive changes). No new matter has been added by these amendments.

Accordingly, claims 1-3 and 5-27 are pending in this Application. Applicants respectfully request reconsideration and allowance of the pending claims. Applicants thank the Examiner for participating in a telephone interview on February 19, 2008, during which the Lakritz reference (WO 01/69420) and the subject matter of claim 10 were discussed. In particular, Applicants noted that Lakritz's master "template" does not represent the claimed back-end model output (claim 10) because Lakritz's master template is not generated in response to execution of a data mining model based upon the input data of a front-end task request.

### *Claim Objections*

The Office Action indicated an objection to the preamble of independent claim 10. The preamble of this claim has been amended to correct a typographical error. No substantive changes have been made to claim 10. Withdrawal of the claim objection is respectfully requested.

### *Rejections under 35 U.S.C. § 102*

#### Claims 10-16

Independent claim 10 was rejected under 35 U.S.C. § 102(b) as being anticipated by Lakritz. Applicants respectfully traverse this rejection because the Lakritz reference fails to disclose each and every element of claim 10.

Unlike claim 10, Lakritz does not teach a method that includes "receiving a back-end model output from the back-end analytical engine, *the back-end model output including*

*information generated in response to the execution of the data mining model based upon the input data of the task request.”* The Office Action contends that Lakritz’s master document template from the master site represents the claimed “back-end model output” and that the localized document (having language-specific information inserted into the template) represents the “updated model output.” This reflects a misunderstanding of Lakritz’s teaching. Indeed, Lakritz’s master template is quite different from the claimed “back-end model output” as described in claim 10.

For example, Lakritz teaches that the web site system uses “a single ‘master’ site which is subsequently displayed in any number of languages.” (Lakritz at p. 7, lines 5-7.) Lakritz explains that the “master site” is built to be “language and country-independent” due to the use of a master document “template.” (Lakritz at p. 7, lines 13-19.) Only after the master document template is created can a visitor’s request for viewing the site be fulfilled “by filling in [the] document template from the master site with the correct language and country content.” (*Id.*) Thus, Lakritz’s master template is not “generated in response to execution of a data mining model *based upon the input data of a front-end task request*” (as set forth in claim 10). Moreover, Lakritz provides no reasoning that would have prompted a skilled artisan to modify the Developer Module 102 so as to achieve the claimed computer-implemented method set forth in claim 10. To the contrary, Lakritz discloses that it is advantageous to maintain only a single master template that is unaffected by requests from front-end visitors. (*See* Lakritz at p. 10, lines 4-8.)

Applicants respectfully submit that independent claim 10 is patentable over Lakritz and all other references cited in the record. Dependent claims 11-16 are patentable for at least the same reasons as independent claim 10 and for the additional inventive features described therein. Prompt allowance of claims 10-16 is respectfully requested.

#### Claims 17-27

Independent claim 17 was rejected under 35 U.S.C. § 102(b) as being anticipated by Lakritz. Applicants respectfully traverse this rejection because the Lakritz reference fails to disclose each and every element of claim 17.

Unlike claim 17, Lakritz does not teach a method that includes “the request from the front-end application including *input data that is employed by a back-end analytical engine to execute the data mining model to generate a back-end model output.*” As previously described, the Office Action contends that Lakritz’s master document template from the master site represents the claimed “back-end model output” and that the localized document (having language-specific information inserted into the template) represents the “updated model output.” Again, this is an erroneous conclusion. The “back-end model output” as described in claim 17 is readily distinguishable from Lakritz’s master template. For instance, Lakritz teaches that a visitor’s request for viewing the site can be fulfilled “by filling in [the] document template from the master site with the correct language and country content,” but this request is processed only after the master document template is created. Thus, contrary to the Office Action’s conclusion, the visitor’s request for viewing the web site does not include “input data that is employed by a back-end analytical engine to execute the data mining model to generate” Lakritz’s master template. Furthermore, Lakritz provides no reasoning that would have prompted a skilled artisan to modify the Developer Module 102 so as to achieve such an operation.

Accordingly, Applicants respectfully submit that independent claim 17 is patentable over Lakritz and all other references cited in the record. Dependent claims 17-27 are patentable for at least the same reasons as independent claim 17 and for the additional inventive features described therein. Prompt allowance of claims 17-27 is respectfully requested.

*Rejections under 35 U.S.C. § 103*

Claims 1-3 and 5-9

Independent claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Lakritz in view of Shimamoto (U.S. Patent No. 6,883,142). Applicants respectfully submit that, even if there was a reason that would have prompted a skilled artisan to modify the Lakritz reference as proposed (an issue that is not conceded herein), the proposed combination of Lakritz and Shimamoto would nevertheless fail to disclose all elements of claim 1.

First, neither Lakritz nor Shimamoto disclose a computer-implemented method that includes a request from a front-end application to execute “a prediction task associated with a prediction engine that uses the data mining model.” Second, the proposed combination of

Lakritz and Shimamoto would also fail to disclose “back-end model output including information generated in response to the execution of the data mining model based upon the input data of the request from the front-end application.” As previously described, the Office Action erred in its conclusion that Lakritz’s master template represents “a back-end model output.” Here, Shimamoto’s sales server 10 fails to provide that which Lakritz is lacking. Accordingly, the § 103 rejection based upon Lakritz and Shimamoto must be withdrawn.

Furthermore, the Office Action erred in the proposed reasoning that would have prompted a skilled artisan to modify Lakritz with Shimamoto’s user language code. In particular, the Office Action incorrectly asserted that Lakritz does not “automatically select the appropriate language of the user as taught by Shimamoto [sic] so that [it] is not necessary for a user to take the trouble of selecting a language each time the user accesses the web server.” (*See* Office Action at p. 9, mailed Nov. 20, 2007.) This proposed reasoning improperly characterizes the disclosure of Lakritz. Indeed, a skilled artisan would not have relied upon the proposed reasoning to modify Lakritz because Lakritz already provides an option to “automatically” determining “the language and country of a Web site visitor” (*see* Lakritz at p. 5, lines 25-26)—albeit an option that is quite different from the method described in claim 1. Applicants respectfully note that the Patent Office must “guard against slipping into the use of hindsight.” *KSR Intern. Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1742 (2007). Moreover, “rejections on obviousness grounds cannot be sustained by mere conclusory statements.” *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006). Again, the § 103 rejection based upon Lakritz and Shimamoto must be withdrawn.

Applicants respectfully submit that independent claim 1 is patentable over Lakritz, Shimamoto, and all other the references cited in the record. Dependent claims 2-3 and 5-9 are patentable for at least the same reasons as independent claim 1 and for the additional inventive features described therein.

### Conclusion

Applicants respectfully request reconsideration and allowance of claims 1-3 and 5-27. It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that

rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the claim amendments herein do not signify concession of unpatentability of claims 1-3 and 5-9 prior to the amendments herein. Applicants hereby specifically reserve the right to prosecute the previously presented subject matter of claims 1-3 and 5-9 (prior to the amendment herein) in a continuation application. Also, Applicants hereby specifically reserve the right to prosecute claims of different or broader scope in a continuation application. The Examiner should infer no (i) adoption of a position with respect to patentability, (ii) change in the Applicant's position with respect to any claim or subject matter of the invention, or (iii) acquiescence in any way to any position taken by the Examiner, based on the amendments made herein.

This submission is accompanied by a Petition for One-Month Extension of Time and the required fee. No other fees are believed to be due at this time. If necessary, please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: March 5, 2008



Michael T. Hawkins  
Reg. No. 57,867

Fish & Richardson P.C.  
60 South Sixth Street  
Suite 3300  
Minneapolis, MN 55402  
Telephone: (612) 335-5070  
Facsimile: (612) 288-9696  
60470181.doc